

GAINOR & DONNER

3250 Mary Street
Suite 405
Miami, Florida 33131
0.305.537-2000
F.305.537-2001

C.305.206.2008

Granted.
So ordered.
5/16/2023

J. PAUL OETKEN

United States District Judge

VIA ECF

Re:

The Honorable J. Paul Oetken United States District Judge Thurgood Marshall U.S. Courthouse 40 Foley Square New York, New York 10007

> United States v. John Costanzo Jr. and Manuel Recio, 22-cr-281 (JPO) Unopposed Motion to Travel to South Carolina

Dear Judge Oetken:

Mr. Recio hereby requests permission to travel to South Carolina from June 20, 2023 to June 25, 2023 to accompany his son, who is participating in a baseball tournament.

Mr. Recio will drive with his son to South Carolina and attend the tournament. Mr. Recio is currently on a \$30,000 unsecured bond and is currently restricted to travel in the SDNY/EDNY and SDFL and points in between for travel only. DE 08.

The government defers to Pretrial Services, which advised through Officer Jim Navarro that Mr. Recio is in compliance with his reporting requirements, that Mr. Recio will submit his itinerary to Mr. Navarro prior to his travel, and that Pretrial Services does not object to this travel request.

Dated: May 15, 2023

New York, New York

Respectfully submitted,

s/ Amber DonnerGainor & Donner3250 Mary Street, Suite 405Miami, Florida 33133

Email: amber.donner@hotmail.com

Counsel for Manuel Recio

Cc: All counsel (via ECF)